



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

233 Peachtree Street Ste. 600
Atlanta, GA 30303

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 2, 2008

Mr. Jim Collingsworth
President
Dixie Pipeline Company
1100 Louisiana Street
Houston, Texas 77002-5227

CPF 2-2008-5008W

Dear Mr. Collinsworth:

On July 7 to 11, 2008, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your hydrostatic test of the Hattiesburg to Demopolis section of Dixie Pipeline Company's 12" pipeline in Alabama and Mississippi.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

§195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

During the Dixie Pipeline Company (Dixie) Hattiesburg to Demopolis hydrostatic test, Dixie did not have available backfill procedures during pipe replacement work for hydrostatic test failures on July 8, 2008.

A copy of the procedure for backfilling the pipeline was requested while observing repair work on July 8, 2008 and one was not available on the site. On July 9, 2008 Dixie provided a copy of Enterprise Products Operating L. P. *Spec. LP-13, Construction Specifications For Land Pipeline Construction, Lowering-In & Backfilling*. The Specification in Sections 2.3 *Supports* and 2.5 *Tie-ins* require tie-ins to be supported by sandbags or other Company approved material at spacing intervals of 15 feet or less to provide stress-free support subsequent to back-filling. The pipeline was not being supported per the specifications. When Dixie personnel were notified of this the PHMSA representative was advised that the Specification was a new construction specification and did not apply as this was a maintenance activity. Dixie subsequently provided a copy of Procedure *MPR-4108 General Line & Equip. Maint. Backfilling and Cleanup*, from the prior Dixie Pipeline Company Maintenance Manual, as the procedure that was being used for the backfilling. The procedure used is not referenced in the current Dixie Pipeline Company *Procedures Manual For Pipeline Operations, Maintenance, and Emergencies*. The current Dixie Pipeline Company *Procedures Manual For Pipeline Operations, Maintenance, and Emergencies* does not address backfilling in *Section 5.5 Pipeline Repairs and Pipeline Movement* nor address the use of prior Dixie procedures.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so will result in Dixie pipeline Company being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 2-2008-5008W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,

A handwritten signature in cursive script that reads "Linda Daugherty". The signature is written in dark ink and is positioned above the printed name and title.

Linda Daugherty
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration